IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	CR No. 15-3051 JB
	)	
vs.	)	
	)	
RICHMOND SAM,	)	
	)	
Defendant.	)	

MOTION TO DECREASE OFFENSE LEVEL BY ONE ADDITIONAL LEVEL FOR ACCEPTANCE OF RESPONSIBILITY

The United States of America respectfully moves this Honorable Court for an order decreasing the ultimate United States Sentencing Guidelines offense level by one additional level under United States Sentencing Guidelines § 3E1.1(b) for a total decrease for acceptance of responsibility of three levels. By nature of his guilty plea to the Indictment, the Defendant permitted the United States and this Honorable Court to allocate their resources efficiently.

WHEREFORE, for the foregoing reasons, the United States respectfully requests that this Honorable Court grant the above-captioned motion.

Respectfully submitted,

DAMON P. MARTINEZ
United States Attorney

Electronically filed on 5/3/2016
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I hereby certify that on May 3, 2016, I filed the foregoing electronically through the CM/ECF system, which caused counsel for the Defendant to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

Electronically filed on 5/3/2016
DAVID M. ADAMS
Assistant United States Attorney